

I'm writing in response to proceeding 05-196. Your intent to require location identification for VoIP phones is good in concept but flawed. Let's review a few scenarios:

- An employee of a corporation is travelling. He has a soft-phone on his laptop and places a call from a hotel room or a friends house - in London. 1) If the company has an IP Telephony (not a VoIP) solution, they would fall outside of your requirements (they could purchase an IP PBX and PRI separately, from different vendors); and 2) the call would originate outside the U.S. and terminate to the PSTN at the company's corp location in the U.S. - How do you determine where the call originated? If the user dials 911, the PSAP thinks the call originated at the users corp. office.
- 2) Re the intent to attempt to establish a database of every wireless access point: This is an impossible task given the amount of wireless routers that exist in the marketplace; and in consumer's households. A call on a VoIP enabled WiFi phone can use any WAP - consumer or otherwise.

And finally, VoIP, as an emerging technology, holds the promise of lower costs, and greater efficiencies. Additional regulations result in increased cost to fulfill the regulatory requirement. This also increases the cost basis of providing the service, which is then passed on to the consumer. This effectively erodes the value proposition of VoIP.

A Recommendation: Let VoIP service providers offer location based services as a value-added option (at an additional cost to the consumer) - and let the market regulate itself.